

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

NETWORK-1 SECURITY SOLUTIONS, INC., a
Delaware corporation,

Plaintiff,

Case No. 6:11-cv-492 LED

vs.

Alcatel-Lucent USA Inc., et al.

Defendants.

JURY TRIAL DEMANDED

**NOTICE OF AGREEMENT IN PRINCIPLE AND
UNOPPOSED MOTION TO STAY DEADLINES**

Plaintiff Network-1 Security Solutions, Inc. (“Network-1”) and Defendants NEC Corporation and NEC Corporation of America (“NEC”) respectfully show the Court as follows:

Network-1 and NEC have reached an agreement in principle. Dismissal papers will be forthcoming. Accordingly, Network-1 and NEC request that this Court stay all dates and deadlines two weeks days with respect to Network-1 and NEC pending the dismissal of NEC from this litigation.

The anticipated settlement will not affect any other parties.

Dated: February 1, 2013

By: /s/ Sean A. Luner (w/permission TJW, Jr.)

Sean A. Luner

State Bar No. 165443

Gregory S. Dovel

State Bar No. 135387

DOVEL & LUNER, LLP

201 Santa Monica Blvd., Suite 600

Santa Monica, CA 90401

Telephone: 310-656-7066

Facsimile: 310-657-7069

Email: greg@dovellaw.com

sean@dovellaw.com

T. John Ward, Jr.

State Bar No. 00794818
Ward & Smith Law Firm
P.O. Box 1231
Longview, Texas 75606-1231
(903) 757-6400 (telephone)
(903) 757-2323 (facsimile)
E-mail: jw@wsfirm.com

***ATTORNEYS FOR PLAINTIFF,
NETWORK-1 SECURITY SOLUTIONS,
INC.***

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served this February 1, 2013 with a copy of this document via the Court's CM/ECF System per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

/s/ T. John Ward, Jr.

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies pursuant to Local Rule CV-7(h) that the relief requested in this motion is unopposed.

/s/ T. John Ward, Jr.